

# EXHIBIT 10

SHEARMAN & STERLING LLP

FAX: 212-848-7179  
TELEX: 667290 WUI  
www.shearman.com

599 LEXINGTON AVENUE  
NEW YORK, N.Y. 10022-6069  
212 848-4000

ABU DHABI  
BEIJING  
BRUSSELS  
DÜSSELDORF  
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ROME  
SAN FRANCISCO  
SÃO PAULO  
SINGAPORE  
TOKYO  
TORONTO  
WASHINGTON, D.C.

WRITER'S DIRECT NUMBER:

212-848-4551

WRITER'S EMAIL ADDRESS:  
brynnna.connolly@shearman.com

September 20, 2005

By Fedex

C. Malcolm Cochran, IV  
Richards, Layton & Finger, P.A.  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

RECEIVED

SEP 21 2005

C. Malcolm Cochran, IV

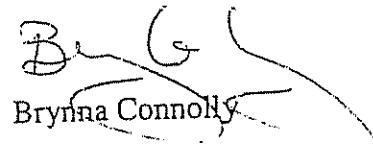
Dear Mr. Cochran and Mr. Amato:

We became aware over the weekend that privileged documents were inadvertently produced in our previous productions. Pursuant to Section 10 of the Stipulation and Protective Order, we hereby request that you return to us the documents bearing the following bates numbers BCE-DH 00001044 – 00001095; BCE-DH 00001230 – 00001289; BCE-AD 0518075 – 0518214; BCE-AD 0519146 – 0519149; and BCET500620 – 500679, as they are covered by attorney-client privilege.

We have enclosed substitute CDs replacing pages BCE-DH 00001046 – 00001095; BCE-DH 00001230 – 00001289; BCE-AD 0518155 – 0518214; BCE-AD 0519146; BCE-AD 0519148; and BCET500620 – 500679 with pages containing redactions. Please return to us the original CDs, and destroy any copies of the documents or CDs, or print-outs made from the images bearing the above bates stamps.

Please do not hesitate to call should you have any questions.

Very truly yours,

  
Brynnna Connolly

Enclosures

# EXHIBIT 11

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SHEARMAN & STERLING LLP

FAX: 212-848-7179  
TELELEX: 667290 WUI  
www.shearman.com

599 LEXINGTON AVENUE  
NEW YORK, N.Y. 10022-6069  
212 848-4000

WRITER'S DIRECT NUMBER:  
212-848-4429

WRITER'S EMAIL ADDRESS:  
ploone@shearman.com

SEP 21 2005

CHAD M. SHANDLER

ABU DHABI  
BEIJING  
BRUSSELS  
DÜSSELDORF  
FRANKFURT  
HONG KONG  
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ROME  
SAN FRANCISCO  
SAO PAULO  
SINGAPORE  
TOKYO  
TORONTO  
WASHINGTON, D.C.

September 20, 2005

Via Federal Express

By Hand

Chad M. Shandler  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Pursuant to Daniel Schimmel's letter dated September 16, 2005, please find enclosed the supplemental privilege log of BCE Inc ("BCE"). Also enclosed is an edited and corrected version of BCE's privilege log dated September 9, 2005. The edited version of the log is still numbered from 1 to 3109 but 54 documents have now been omitted from the log and produced. Seven duplicate entries have also been removed from the log. In addition, we have enclosed a CD containing some additional documents previously withheld on the ground of privilege, but which should be produced. They are bates-stamped BCE-AD 0534877 - BCE-AD 0543111.

Please do not hesitate to call should you have any questions.

Very truly yours,



Piret Loone

Enclosures

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# EXHIBIT 12

SHEARMAN & STERLING LLP

FAX: 212-848-7179  
TELEX: 667290 WUI  
www.shearman.com

599 LEXINGTON AVENUE  
NEW YORK, N.Y. 10022-6069  
212 848-4000

ABU DHABI  
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SINGAPORE  
TOKYO  
TORONTO  
WASHINGTON, D.C.

WRITER'S DIRECT NUMBER:

212-848-4551

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SEP 21 2005

WRITER'S EMAIL ADDRESS:  
bryonna.connolly@shearman.com

C. Malcolm Cochran, IV

September 20, 2005

Via Email and Federal Express

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

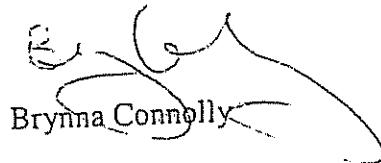
John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Please find enclosed documents bates-stamped BCE-AD 0543112 - BCE-AD 0543355 from the files of Martine Turcotte and BCE-AD 0543356 - BCE-AD 0543358 from the files of Michel Lalande. Please note that some of these documents have been redacted for privilege. We have also enclosed a privilege log for those redactions. The documents are submitted subject to the Responses and Objections of BCE Inc. to Debtors' First Request for Production of Documents Directed to Defendant BCE Inc., served on October 29, 2004 and Defendants Responses and Objections to the Committee's First Request for the Production of Documents, served on February 28, 2005. Please do not hesitate to call should you have any questions.

Sincerely,



Brynna Connolly

Enclosure

# EXHIBIT 13

SHEARMAN & STERLING LLP

FAX: 212-848-7179  
TELEX: 667290 WUI  
www.shearman.com

599 LEXINGTON AVENUE  
NEW YORK, N.Y. 10022-6069  
212 848-4000

WRITER'S DIRECT NUMBER:  
212-848-4551

WRITER'S EMAIL ADDRESS:  
brynnna.connolly@shearman.com

RECEIVED

SEP 26 2005

G. Malcolm Cochran, IV

September 23, 2005

ABU DHABI  
BEIJING  
BRUSSELS  
DÜSSELDORF  
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SINGAPORE  
TOKYO  
TORONTO  
WASHINGTON, D.C.

Via Federal Express

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

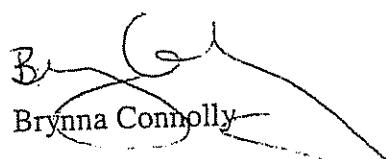
Gentlemen:

We learned on Wednesday that privileged documents were inadvertently included on the CD we sent to you on Tuesday, September 20, 2005. Pursuant to Section 10 of the Stipulation and Protective Order, we hereby request that you return to us the documents bearing the bates numbers BCE-AD 0534942 – 0534958; BCE-AD 0538806 – 0538809; BCE-AD 0540915 – 0540917; and BCE-AD 0540947 – 0540948. We have enclosed a substitute CD replacing the pages of the documents with placeholders indicating that the pages are intentionally left blank. Please return to us the original CD, and destroy any copies of the CD or print-outs made from the images bearing the above bates stamps.

The document bearing bates numbers BCE-AD 0540915 – 0540917 has been redacted, and in accordance with your previous request, we are enclosing a re-stamped version of that document bearing new bates numbers BCE-AD 0543360 – 0543362. We have also enclosed at your request a re-stamped copy of the document originally stamped BCE-AD 0498377 – 0498404, produced to you in redacted form on the CD of September 12, 2005, which is now stamped BCE-AD 0543363 – 0543390.

Please do not hesitate to contact me should you have any questions.

Sincerely,

  
Brynna Connolly

Enclosures

# EXHIBIT 14

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069  
WWW.SHEARMAN.COM | T +1 212 848 4000 | F +1 212 848 7179

212-848-4551

WRITER'S EMAIL ADDRESS:  
brynnna.connolly@shearman.com

November 1, 2005

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NOV 6 2005

C. Malcolm Cochran, IV

Via Federal Express

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

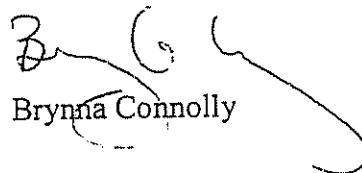
Gentlemen:

As George Wade indicated at the hearing yesterday, we have become aware that some documents initially withheld as privileged and included on the privilege log are not privileged and should be produced. We have enclosed these documents, bates stamped BCE-AD 0545015-0545035. The custodian information for each document, as well as its location on the privilege log, is indicated in the attached chart.

Additionally, we have identified two documents withheld as privileged that have been previously produced. Document number 15 from BCE's Rule 2004 privilege log has been previously produced to you as BCET411458-411459. Document numbers 1565, 4004 and 4414 from the September 2005 privilege log has been previously produced to you as BCE-AD 0541734-0541746.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Brynnna Connolly

Enclosures

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CUSTODIAN CHART

Privlog Doc. No.	Bates range	Custodian
Sept. '05 Log No. 01863, 04019	BCE-AD 0545015-0545017	Michel Lalande, Patrick Pichette
Sept. '05 Log No. 04419	BCE-AD 0545018	Patrick Pichette
Sept. '05 Log No. 04008, 04418	BCE-AD 0545019	Patrick Pichette
Sept. '05 Log No. 04007, 04417	BCE-AD 0545020	Patrick Pichette
Sept. '05 Log No. 04006, 04416	BCE-AD 0545021-0545022	Patrick Pichette
Sept. '05 Log No. 04005, 04415	BCE-AD 0545023-0545024	Patrick Pichette
Sept. '05 Log No. 03258	BCE-AD 0545025	Michael Boychuk
Sept. '05 Log No. 01245	BCE-AD 0545026	Patrick Pichette
Sept. '05 Log No. 03837	BCE-AD 0545027	Line Patenaude
Rule 2004 Log No. 00025	BCE-AD 0545028-0545035	Michel Lalande

# EXHIBIT 15

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069  
WWW SHEARMAN COM | T +1 212 848 4000 | F +1 212 848 7179

RECEIVED

WRITER'S DIRECT DIAL:  
212-848-4551

NOV 07 2005

C. Malcolm Cochran, IV

WRITER'S EMAIL ADDRESS:  
bryonna.connolly@shearman.com

November 4, 2005

Via Federal Express

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

Via Hand Delivery

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

We have become aware that some additional documents initially withheld as privileged and included on the privilege log and should be produced. We have enclosed these documents, bates-stamped BCE-AD 0545036-0545064. The custodian information is unidentifiable. These documents appear on the September 2005 privilege log as entries 02702 and 03787. In addition, please find enclosed a revised version of the June 28, 2000 BCE board minutes, which are bates-stamped BCE-AD 0545065-0545073, for which the custodian is the BCE Secretariat.

The materials are submitted subject to the Responses and Objections of BCE Inc. to Debtors' First Request for Production of Documents Directed to Defendant BCE Inc., served on October 29, 2004 and Defendants Responses and Objections to the Committee's First Request for the Production of Documents, served on February 28, 2005.

Please do not hesitate to contact me should you have any questions.

Sincerely,

  
Brynna Connolly

Enclosures

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# EXHIBIT 16

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

WWW.SHEARMAN.COM | T +1.212.848.4000 | F +1.212.848.7179

212-848-4608

WRITER'S EMAIL ADDRESS:  
dschimmel@shearman.com

November 15, 2005

RECEIVED

NOV 16 2005

G.V.V

Via Federal Express

Collins J. Seitz, Jr., Esq.  
Connolly Bove Lodge & Hutz  
1007 North Orange Street  
P.O. Box 2207  
Wilmington, DE 19899

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Dear Special Master Seitz:

Please find attached documents R1, R130, R160, R183, R184, R185, R245, R457, R458, R462, R464, R495, R700, R713, R732, for in camera inspection. Those documents are attached under Tab A. To the extent a document was produced to Plaintiffs in redacted form, we attach both the redacted and unredacted versions of the document.

Plaintiffs have requested that documents R4, R100, R145, R157, R188, R302, R457, R594, be inspected in camera, but those documents were previously produced to Plaintiffs. We have attached those documents to this letter under Tab B. We are sending to Plaintiffs a copy of the documents set forth under Tab B.

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We are in the process of gathering the remaining documents on Plaintiffs' list and comparing them with BCE's document production. To the extent they were withheld on the ground of privilege, we will submit them for in camera inspection tomorrow.

Respectfully submitted,



Daniel Schimmel

Enclosures

Cc: C. Malcolm Cochran, IV (via Federal Express) (without enclosure)  
John P. Amato (via Federal Express) (without enclosure)  
Gregory V. Varallo (via Federal Express) (without enclosure)  
Pauline K. Morgan (via Federal Express) (without enclosure)

# EXHIBIT 17

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

WWW.SHEARMAN.COM | T +1 212 848 4000 | F +1 212 848 7179

212-848-4608

WRITER'S EMAIL ADDRESS:  
dschimmel@shearman.com

November 16, 2005

Via Federal Express and Email

Collins J. Seitz, Jr., Esq.  
Connolly Bove Lodge & Hutz  
1007 North Orange Street  
P.O. Box 2207  
Wilmington, DE 19899

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Dear Special Master Seitz:

R documents:

Please find attached documents R74, R77, R79, R82, R83, R101, R126, R143, R147, R187, R461, R726, R727, R734, R735, R737, and R738 for in camera inspection. Those documents are attached under Tab A.<sup>1</sup> To the extent a document was produced to Plaintiffs in redacted form, we attach both the redacted and unredacted versions of the document. We also clarify the status of Document R101. R101 is a memorandum with handwritten comments of BCE's general counsel. Several versions of that memorandum were previously produced, which did not include the handwritten comments of BCE's general counsel. Those previously produced versions include BCE-AD 0198003-04, BCET082719-20, and BCET011002-03.

Documents R272 is a duplicate of R185, which was submitted for in camera inspection yesterday.

<sup>1</sup> The privilege log attached to Mr Shandler's transmittal affidavit as Exhibit R is not the most recent version of that log. The most recent version of that log was submitted to Plaintiffs on July 27, 2004. It is attached hereto under Tab B. Documents R147, R164, R461, R726, R734, R737, and R738 are duplicates of documents R476, R83, R250, R165, R494, R495, and R496, respectively. The description of those documents in the July 27, 2004 log is set forth in the entries corresponding to documents R476, R83, R250, R165, R494, R495, and R496.

Document 87 was produced to Plaintiffs in redacted form. The unredacted version of Document R87 is located in a storage facility in New Jersey. We have recalled the document, and we will submit it for inspection as soon as we receive it, which we anticipate will be on Thursday.

Attached under Tab C is Document R187, which was previously produced as BCE-AD 0220620-21.

Attached under Tab D are documents that were previously withheld, but that should be produced. Those documents are R24, R110, and R161. We are sending to Plaintiffs a copy of the documents set forth under Tab D.

T Documents:

We do not have a record of recalling document T11, and we do not believe that this document is privileged.

The document identified as T42 was redacted on the ground of privilege. BCE has asserted the attorney-client privilege over internal drafts of BCE's letter of support to the members of the Teleglobe lending syndicate. Those drafts were internal BCE documents reflecting the advice of BCE's counsel. We attach the redacted and unredacted versions of this document for in camera inspection under Tab E.

We have reviewed document T1156 and believe that the document should not have been redacted. We produced it in unredacted form at R.2004-BCE 048528.

We have no record of recalling document T2054. The document should not have been included on the privilege log. Our records indeed indicate that we have produced on two occasions the document attached to Plaintiffs' letter, which was produced as BCE-SUP 127135-36 and BCE-AD 0195197-98.

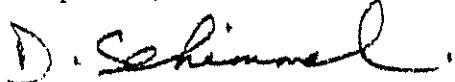
Document T2883 is attached under Tab F. We believe that this document should not have been withheld. We will produce it and remove it from the privilege log.

At the hearing before Chief Judge Robinson on November 13, 2005, Plaintiffs advised the Court of the status of the proceedings before the Special Master, and the Court was satisfied with that explanation. In addition, the cut-off date for the completion of fact discovery has been extended to January 31, 2006.

We are currently preparing a spreadsheet that lists the 50 documents, with notations as to the current status of each document, which we will forward to you and plaintiffs' counsel.

We apologize that we did not provide these documents earlier. I was in Africa last week as part of my ongoing commitment to provide assistance with respect to the United Nations International Criminal Tribunal for Rwanda. In addition, my colleague who helped in supervising the preparation of the privilege logs was out of the country as well last week.

Respectfully submitted,



Daniel Schimmel

Enclosures

Cc: C. Malcolm Cochran, IV  
John P. Amato  
Gregory V. Varallo  
Pauline K. Morgan

# EXHIBIT 18

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069  
WWW SHEARMAN.COM | T +1 212 848.4000 | F +1 212 848.7179

RECEIVED

WRITER'S DIRECT DIAL:  
212-848-4551

WRITER'S EMAIL ADDRESS:  
bryonna.connolly@shearman.com

NOV 22 2005

C. Malcolm Cochran, IV

November 16, 2005

Via Federal Express

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

Via Hand Delivery

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

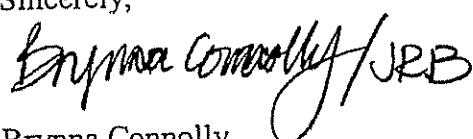
Gentlemen:

We have become aware that an additional document, initially withheld as privileged and included on the privilege log, should be produced. We have enclosed this document, bates-stamped BCE-AD 0545214-0545215. The custodian information is unidentifiable. This document appears on the September 2005 privilege log as entry 3543. In addition, in response to your correspondence, dated November 9, 2005, please find enclosed a document presented at the June 28, 2000 BCE board meeting, which is bates-stamped BCE-AD 0545163-0545213, for which the custodian is the BCE Secretariat. Please note that the bates range BCE-AD 0545074-0545125 has been intentionally left blank.

The materials are submitted subject to the Responses and Objections of BCE Inc. to Debtors' First Request for Production of Documents Directed to Defendant BCE Inc., served on October 29, 2004 and Defendants Responses and Objections to the Committee's First Request for the Production of Documents, served on February 28, 2005.

Please do not hesitate to contact me should you have any questions.

Sincerely,

  
Brynna Connolly, JPB

Brynna Connolly

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# EXHIBIT 19

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

WWW.SHEARMAN.COM | T +1.212.848.4000 | F +1.212.848.7179

212-848-4190

WRITER'S EMAIL ADDRESS:  
[gwade@shearman.com](mailto:gwade@shearman.com)

November 23, 2005

RECEIVED

NOV 28 2005

C. Malcolm Cochran, IV

Via Federal Express and Email

Collins J. Seitz, Jr., Esq.  
 Connolly Bove Lodge & Hutz  
 1007 North Orange Street  
 P.O. Box 2207  
 Wilmington, DE 19899

---

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Dear Special Master Seitz:

We are attaching a chart describing the status of each of the documents identified by the plaintiffs in their letter to you of November 4, 2005. As we noted in our previous letters to you, many of these documents have been produced by BCE. The documents that were not produced have been submitted to you for in camera inspection.

We have identified three documents whose status we would like to clarify. Following a thorough search, we became aware that the document entitled R1 should have been produced earlier, but was mistakenly not produced. We produced that document to the plaintiffs today as BCE-AD 0545221 – 0545231 (attached). The document submitted to you on November 15, 2005, as R1 is, in fact, R2, a different version of the same memorandum. On page BCE-SUP120494 of document R2, a handwritten notation was redacted on the ground of privilege, as indicated in the privilege log.

Document R87 should have been produced earlier. We have produced R87 to the plaintiffs today as BCE-AD 0545232 – 0545257 (attached). We should also note that the final version of the privilege log, submitted to you on November 16, 2005, indicates that this document was redacted, whereas the version of the privilege log submitted by the plaintiffs does not indicate that this document was redacted. Entry R87 on the final version of the log is incorrect in this respect.

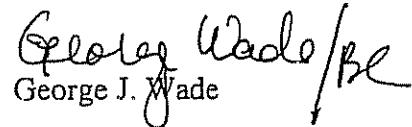
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The document identified as R183 has already been produced as BCE-SUP121841-850; BCE-AD 0059052-062; BCE-AD 0372597 – 608; BCE-AD 0388335 – 346; BCE-AD 0503183 – 194; and BCE-AD 0503195 – 206. This memorandum may also be found among the plaintiffs' documents as TGV00040494 – 503; TGV00055419 – 428; and TMORK00000061 – 71. The outline submitted to you as R183 on November 15, 2005, is a different document; that outline has been withheld as R464.

We apologize for this inconvenience.

Respectfully submitted,

  
George J. Wade

Enclosures

Cc: C. Malcolm Cochran, IV  
John P. Amato  
Gregory V. Varallo (attachments via email only)  
Pauline K. Morgan (attachments via email only)

---

# EXHIBIT 20

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

WWW.SHEARMAN.COM | T +1.212.848.4000 | F +1.212.848.7179

212-848-4551

WRITER'S EMAIL ADDRESS:  
bryonna.connolly@shearman.com

RECEIVED

December 6, 2005

DEC 07 2005

C. Malcolm Cochran, IV

Via Federal Express and Email

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Enclosed please find an additional hard copy document recently identified from the files of Michael Sabia, bates stamped BCE-AD 0545258-0545289, which was erroneously designated as nonresponsive.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Brynna Connolly

Enclosure

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# EXHIBIT 21

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BRUCE M. STARGATT  
BEN T. CASTLE  
SHIELDON N. SANDLER  
RICHARD A. LEVINE  
RICHARD A. ZAPPA  
FREDERICK W. JOBST  
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EDWIN J. HARRON  
MICHAEL R. NESTOR  
MAUREEN D. LUKE  
ROLIN P. BISSELL  
SCOTT A. HOLT  
JOHN T. DORSEY  
M. BLAKE CLEARY

THE BRANDYWINE BUILDING  
1000 WEST STREET, 17TH FLOOR  
WILMINGTON, DELAWARE 19801

P.O. BOX 391  
WILMINGTON, DELAWARE 19899-0391  
(302) 571-6600  
(800) 253-2234 (DE ONLY)  
FAX: (302) 571-1253

110 WEST PINE STREET  
P. O. BOX 594  
GEORGETOWN, DELAWARE 19947  
(302) 856-3571  
(800) 255-2234 (DE ONLY)  
FAX: (302) 856-9338  
WWW.YOUNGCONAWAY.COM

DIRECT DIAL: (302) 571-6707  
DIRECT FAX: (302) 576-3318  
pmorgan@ycst.com

ATHANASIOS E. AGELAKOPOULOS  
JOSEPH M. BARRY  
SEAN M. BEACH  
DONALD J. BOWMAN, JR.  
TIMOTHY P. CAIRNS  
KARA HAMMOND COYLE  
CURTIS J. CROWTHER  
MARGARET M. DIBIANCA  
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RICHARD S. JULIE  
KAREN E. KELLER  
JENNIFER M. KUNKUS  
EDWARD J. KOSMOWEK  
JOHN C. KUFFEL

SPECIAL COUNSEL  
JOHN D. MC LAUGHLIN, JR.  
ELENA C. NORMAN (NY ONLY)  
KAREN L. PASCALE  
PATRICIA A. WIDDSS

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CHRISTIAN DOUGLAS WRIGHT  
SHARON M. ZIEG

OF COUNSEL  
STUART B. YOUNG  
EDWARD B. MAXWELL, 2ND

December 7, 2005

**BY HAND DELIVERY**

Collins J. Seitz, Jr., Esquire  
Connolly Bove Lodge & Hutz  
1007 North Orange Street  
P.O. Box 2207  
Wilmington, DE 19899

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Dear Special Master Seitz:

In the Decision on Plaintiffs' Motion to Compel Defendants to Produce Documents Withheld on the Basis of Privilege, dated December 1, 2005 (the "Decision"), the Special Master instructed BCE to produce to Plaintiffs all documents reflecting work performed by Davies Ward after April 8, 2002 on the basis that "the firm was exclusively representing Teleglobe on funding issues." (Decision at 17 n.8.) Attached to this letter under Tab A is an affidavit of Vincent A. Mercier of Davies Ward that was submitted to the Ontario Superior Court, sworn to on November 3, 2004 (the "Affidavit"), describing the scope and duration of Davies Ward's work for Teleglobe Inc. The Affidavit indicates that "on or about April 10, it was decided that Davies would act as counsel for Teleglobe...." (Aff. ¶ 7; see also Turcotte Dep. at 456:21-23.) In our letter to the Special Master dated November 15, 2005, we had referred to the Affidavit, but did not attach it to that letter. It is attached here under Tab A. There are twelve documents on BCE's privilege logs that reflect legal work performed by Davies Ward between April 8 and the morning of April 10, 2002, one of which appears three times on the logs. We believe that those documents reflect work performed exclusively for BCE, not Teleglobe, and we

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Collins J. Seitz, Jr., Esquire

December 7, 2005

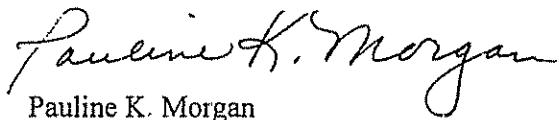
Page 2

submit them for in camera inspection under Tab B. Those are entries R15, R476, S87, S214, T287, T311, T342, T1644, T2889, U3740, U4354, and U4608 on the privilege logs.<sup>1</sup>

The Affidavit further indicates that, following April 10, 2002, "the BCE Retainer ceased, except with respect to advice concerning certain BCE public disclosure, compliance and governance issues in respect of which Davies had already been providing advice to BCE," and that Davies Ward "ceased acting for Teleglobe" on April 18, 2002 but "continued to assist Teleglobe in preparation for its Board meeting on April 24, 2002 and help transition the file to Ogilvy Renault." (Aff. ¶¶ 7, 9.) We have reviewed the documents on BCE's privilege logs reflecting work performed by Davies Ward from April 10 to May 10, 2002 (i.e., a time-period conservatively encompassing the transition of the file to Ogilvy Renault). Upon further review, a few documents may reflect work performed for Teleglobe, some may well have been shared with Teleglobe, and a few should not have been withheld; we will produce all of those promptly. We believe, however, that some of those documents reflect work performed by Davies Ward exclusively for BCE. Several of those documents refer to an analysis of BCE's and Bell Canada's own credit facilities. The entries corresponding to work that, we believe, was performed for BCE are R160, R181, R185, R203, R708, R713, S260, T297, T306, T316, T378, T401, T837, T1054, T2241, T2254, T2871, U3483, U3484, U3490, U3491, U3492, U3493, U3494, U3495, U3503, U3504, U4337, U4605, U4606, U4649, and U4784. We submit those documents for in camera inspection under Tab C.

Should you have any questions or require any additional information, we are available at your convenience.

Respectfully,



Pauline K. Morgan

PKM:dw

Enclosures

cc: C. Malcolm Cochran, IV (enclosing Tab A only)  
John P. Amato (enclosing Tab A only)  
Gregory V. Varallo (enclosing Tab A only)  
George J. Wade  
(all by E-mail)

<sup>1</sup> Entries preceded by an "R" refer to entries on the log attached as Tab B to Mr. Schimmel's letter dated November 16, 2005. Entries preceded by an "S," "T," or "U" refer to entries on the logs dated February 18, 2005, September 9, 2005, and September 19, 2005, respectively, which are attached as Exhibits S, T, and U to Mr. Shandler's transmittal affidavit.

# EXHIBIT 22

## YOUNG CONAWAY STARGATT &amp; TAYLOR, LLP

BRIUCE M. STARGATT  
 BEN T. CASTLE  
 SHELDON N. SANDLER  
 RICHARD A. LEVINE  
 RICHARD A. ZAPPA  
 FREDERICK W. IOUST  
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 1000 WEST STREET, 17TH FLOOR  
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 P.O. BOX 391  
 WILMINGTON, DELAWARE 19899-0391  
 (302) 571-6600  
 (800) 253-2234 (DE ONLY)  
 FAX: (302) 571-1253

110 WEST PINE STREET  
 P.O. BOX 594  
 GEORGETOWN, DELAWARE 19947  
 (302) 856-3571  
 (800) 255-2234 (DE ONLY)  
 FAX: (302) 856-9338

WWW.YOUNGCONAWAY.COM  
 DIRECT DIAL: 302-571-6707  
 DIRECT FAX: 302-576-3318  
 pmorgan@ycst.com

ATHANASIOS E. AGELAKOPOULOS  
 LISA A. ARMSTRONG  
 GREGORY J. BABCOCK  
 JOSEPH M. BARRY  
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 CHRISTIAN DOUGLAS WRIGHT  
 SHARON M. ZIEG

OF COUNSEL  
 STUART B. YOUNG  
 EDWARD B. MAXWELL, 2ND

December 16, 2005

Via Hand Delivery

Collins J. Seitz, Jr., Esquire  
 Connolly Bove Lodge & Hutz  
 1007 North Orange Street  
 P.O. Box 2207  
 Wilmington, DE 19899

Re: *Teleglobe Communications Corporation et al. v. BCE Inc. et al.*

Dear Special Master Seitz:

We submit this letter pursuant to the Supplemental Decision on Plaintiffs' Motion to Compel Defendants to Produce Documents Withheld on the Basis of Privilege, dated December 9, 2005 (the "Supplemental Decision"). Under separate cover, we are sending to you (1) an updated privilege log for documents located on the July 2004 and February 2005 privilege logs that continue to be withheld for the time period between November 1, 2001 to and including April 23, 2002 (the "Period"), and (2) for *in camera* review, all documents from those two logs that continue to be withheld for the Period. We have thoroughly reviewed those two logs in accordance with the standards set forth in your December 1, 2005 decision, and we are producing to the plaintiffs all the documents on those logs that should have been produced earlier or should now be produced in accordance with those standards. We are also engaged in a similar review of the documents on the September 2005 privilege log.

In the Supplemental Decision, you indicated that several of the documents submitted for *in camera* review support the plaintiffs' argument that BCE's in-house counsel

## YOUNG CONAWAY STARGATT &amp; TAYLOR, LLP

Collins J. Seitz, Jr., Esquire

December 16, 2005

Page 2

provided advice to both BCE and Teleglobe on matters related directly or indirectly to consideration of alternatives to continued funding of Teleglobe. Supplemental Decision at 3-4, citing R82, R130, R464, R145. We respectfully do not believe that those documents reflect a joint representation of BCE and Teleglobe. Document R464, dated April 16, 2002, is a memorandum prepared by Stikeman Elliott, outside counsel for BCE in Canada. That memorandum was prepared to help BCE analyze the fiduciary duties of its directors and the fiduciary duties of the directors of Teleglobe Inc., its subsidiary. BCE had its own legal interest in understanding the fiduciary duties owed by the directors and officers of Teleglobe Inc. because, among other things, BCE was required to indemnify those individuals under certain circumstances. We believe that Document 167 on the privilege log supports the view that R464 was prepared for BCE (*see* point 4 in that document).

Document R145 is a memorandum prepared by Mr. Lalande, dated January 21, 2002. Mr. Lalande prepared this memorandum to determine whether BCE could provide additional funding to Teleglobe Inc. while protecting that investment by taking security on Teleglobe's assets. Mr. Lalande testified that he performed that work on behalf of BCE. (Lalande Dep. at 324:15-19.) The document was previously produced because it was shared with third parties at the time.

Documents R82 and R130 concern the public securities filings of BCE and Teleglobe Inc. in April 2002. Following the closing of BCE's acquisition of Teleglobe Inc. in November 2000, lawyers in the BCE Law Department, including Mr. Lalande, helped prepare the public securities filings of Teleglobe Inc. In April 2002, Mr. Lalande continued to work for Teleglobe Inc. in connection with the preparation of its public securities filings, which was "the only ad hoc mandate I still had from a Teleglobe standpoint at that point in time." (Lalande Dep. at 497:9-13.)<sup>1</sup>

BCE, however, had a separate legal interest in reviewing those public securities documents. Because BCE filed consolidated financial statements, BCE was required to ensure that the statements contained in its public securities documents and those of its subsidiaries were consistent. BCE was also subject to legal requirements regarding "control" liability under the securities laws, which required BCE lawyers, including Mr. Lalande, to review the public securities documents of BCE's subsidiaries to ensure that they were accurate. Documents R82 and R130 reflect communications between BCE and its outside counsel regarding the public securities documents, and the redacted language in the first paragraph of Document R130 indicates that those communications occurred on behalf of BCE.

Some of the documents set forth on the privilege logs have been redacted for non-responsiveness. BCE has produced to the plaintiffs board minutes of BCE and certain of its subsidiaries, such as Bell Canada and Bell Canada Holdings. Those board minutes were redacted where the information contained in the minutes was not responsive to plaintiffs' document requests. To the extent the documents on the privilege logs include drafts of board

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<sup>1</sup> Mr. Lalande also worked on a transaction involving VarTec.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Collins J. Seitz, Jr., Esquire

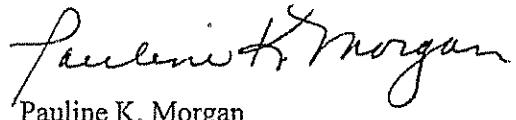
December 16, 2005

Page 3

minutes, those drafts have been redacted for non-responsiveness in accordance with BCE's prior practice. We submit them for *in camera* review in redacted and unredacted form.

Should you have any questions or require any additional information, we are available at your convenience.

Respectfully submitted,



Pauline K. Morgan

PKM:mjm

cc: C. Malcolm Cochran, IV, Esquire  
John P. Amato, Esquire  
Gregory V. Varallo, Esquire  
George J. Wade, Esquire  
(by email)

# EXHIBIT 23

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

WWW.SHEARMAN.COM | T +1 212 848 4000 | F +1 212 848 7179

WRITER'S DIRECT DIAL:  
212-848-4551

WRITER'S EMAIL ADDRESS:  
bryonna.connolly@shearman.com

December 16, 2005

Via Email and Hand Delivery

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

Via Email and Federal Express

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

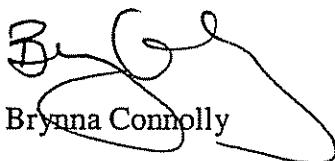
Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Enclosed please find one box and one CD containing documents initially withheld on the grounds of privilege on BCE's July 2004 and February 2005 privilege logs, respectively. Bates-ranges BCE-AD 0545374 - BCE-AD 0547203 and BCE-AD 0548111 - BCE-AD 0548205 correspond to documents from the July 2004 privilege log; bates range BCE-AD 0547204 - BCE-AD 0548110 corresponds to documents from the February 2005 privilege log.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Brynna Connolly

Enclosures

cc: Pauline K. Morgan (Via Email, without enclosures)

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DOC_NO	PROD_BEG	PROD_END	CUSTODIAN
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7	BCE-AD 0547217	BCE-AD 0547217	Unidentifiable
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22	BCE-AD 0547220	BCE-AD 0547235	Unidentifiable
23	BCE-AD 0547236	BCE-AD 0547238	M. Ryan
25	BCE-AD 0547239	BCE-AD 0547246	M. Ryan
26	BCE-AD 0547247	BCE-AD 0547249	M. Ryan
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68	BCE-AD 0547288	BCE-AD 0547310	M. Turcotte
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180	BCE-AD 0547631	BCE-AD 0547642	M. Cossette
181	BCE-AD 0547643	BCE-AD 0547653	M. Cossette
182	BCE-AD 0547654	BCE-AD 0547656	M. Cossette
184	BCE-AD 0547657	BCE-AD 0547724	M. Cossette
194	BCE-AD 0547725	BCE-AD 0547728	I. Ricciuto
195	BCE-AD 0547729	BCE-AD 0547749	I. Ricciuto
197	BCE-AD 0547750	BCE-AD 0547756	I. Ricciuto
200	BCE-AD 0547757	BCE-AD 0547763	I. Ricciuto
204	BCE-AD 0547764	BCE-AD 0547779	I. Ricciuto
208	BCE-AD 0547780	BCE-AD 0547782	I. Ricciuto

DOC_NO	PROD_BEG	PROD_END	CUSTODIAN
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217	BCE-AD 0547850	BCE-AD 0547856	I. Ricciuto
220	BCE-AD 0547857	BCE-AD 0547889	I. Ricciuto
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224	BCE-AD 0547906	BCE-AD 0547922	I. Ricciuto
225	BCE-AD 0547923	BCE-AD 0547931	I. Ricciuto/Chatel
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239	BCE-AD 0548042	BCE-AD 0548049	I. Ricciuto
250	BCE-AD 0548050	BCE-AD 0548063	I. Ricciuto
253	BCE-AD 0548064	BCE-AD 0548069	Unidentifiable
256	BCE-AD 0548070	BCE-AD 0548078	I. Ricciuto
257	BCE-AD 0548079	BCE-AD 0548092	I. Ricciuto
258	BCE-AD 0548093	BCE-AD 0548106	I. Ricciuto
260	BCE-AD 0548107	BCE-AD 0548110	I. Ricciuto

# EXHIBIT 24

SHEARMAN & STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069  
WWW SHEARMAN COM | T +1 212.848.4000 | F +1 212.848.7179

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DEC 27 2005

C. Malcolm Cochran, IV

WRITER'S DIRECT DIAL:  
212-848-4551

WRITER'S EMAIL ADDRESS:  
brynnna.connolly@shearman.com

December 19, 2005

Via Email and Federal Express

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Enclosed please find additional hard copy documents recently identified from the files of Marc Ryan, bates stamped BCE-AD 0548206 - BCE-AD 0548323, which were erroneously designated as nonresponsive. Please do not hesitate to contact me should you have any questions.

Sincerely,

  
Brynna Connolly /mo

Brynna Connolly

Enclosures

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599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

WWW.SHEARMAN.COM | T +1.212.848.4000 | F +1.212.848.7179

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212-848-4885

DEC 23 2005

WRITER'S EMAIL ADDRESS:  
elizabeth.walker@shearman.com

C. Malcolm Cochran, IV

December 22, 2005

Via Courier

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

By Hand

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Enclosed please find a CD containing documents initially withheld on the grounds of privilege on BCE's September 2005 privilege log. The documents on the enclosed CD correspond to the Bates-range BCE-AD 0548324 - BCE-AD 0567031.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Elizabeth M. Walker

Enclosures

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# EXHIBIT 25

## SHEARMAN &amp; STERLING LLP

599 LEXINGTON AVENUE | NEW YORK | NY | 10022-6069

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(DEC 22 2005)

212-848-4885

C. Malcolm Cochran, IV

WRITER'S EMAIL ADDRESS:  
elizabeth.walker@shearman.com

December 21, 2005

Via Federal Express and E-mail

C. Malcolm Cochran, IV  
 Richards, Layton & Finger  
 One Rodney Square  
 920 N. King Street  
 Wilmington, DE 19801

John P. Amato  
 Hahn & Hessen LLP  
 488 Madison Avenue  
 New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Over the course of the past few days we became aware that four privileged documents were inadvertently produced. Pursuant to Section 10 of the Stipulation and Protective Order, we hereby request that you return these documents and destroy any copies you may have.

- On December 18, 2005 we became aware that privileged document bearing the Bates number BCE-AD 0372635 was inadvertently included in the document production made on July 27, 2005. We are enclosing a substitute CD containing a page in place of this document stating "Intentionally Left Blank," please return to us the original CD, and destroy any copies of the CD or print-outs made from the image bearing the above Bates stamp.
- On December 19, 2005, we became aware that two documents that should have been redacted were inadvertently produced in unredacted form. Those documents bear Bates numbers BCE-AD 0498353 through BCE-AD 0498376 and BCE-AD 0514213 through BCE-AD 0514235, and were produced on August 29, 2005 and August 31, 2005, respectively. We are enclosing substitute CDs containing pages stating "Intentionally Left Blank" in place of these documents. Please return to us the original CDs, and destroy any copies of the CDs or print-outs made from the images bearing the above Bates stamps. We will produce a redacted version of those two documents tomorrow along with documents initially on the September 2005 privilege log.
- On December 20, 2005, we became aware that document bearing Bates numbers R.2004-BCE016404 through R.2004-BCE016430 was inadvertently included in the hard copy production made on or about March 23, 2004. Please return to us the paper document produced, and destroy any copies of the document bearing the above Bates stamps.

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Please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth M. Walker".

Elizabeth M. Walker

# EXHIBIT 26

599 Lexington Avenue | New York | NY | 10022-6069  
www.shearman.com | 1 +1.212.848.4000 | F +1.212.848.7179

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212-848-4885

DEC 23 2005

WRITER'S EMAIL ADDRESS:  
elizabeth.walker@shearman.com

C. Malcolm Cochran, IV

December 22, 2005

Via Courier

C. Malcolm Cochran, IV  
Richards, Layton & Finger  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

By Hand

John P. Amato  
Hahn & Hessen LLP  
488 Madison Avenue  
New York, NY 10022

Re: *Teleglobe Communications Corporation, et al. v. BCE Inc., et al.*

Gentlemen:

Enclosed please find a CD containing documents initially withheld on the grounds of privilege on BCE's September 2005 privilege log. The documents on the enclosed CD correspond to the Bates-range BCE-AD 0548324 - BCE-AD 0567031.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Elizabeth M. Walker

Enclosures

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# EXHIBIT 27

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 BEN T. CASTLE  
 S. V'N SANDLER  
 A. LEVINE  
 K. D. A. ZAPPA  
 FREDERICK W. IOBST  
 RICHARD H. MORSE  
 DAVID C. MCBRIDE  
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RICHARD J. A. POPPER  
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 C. BARR FLINN  
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 MAUREEN D. LUKE  
 ROLIN P. BISSELL  
 SCOTT A. HOLT  
 JOHN T. DORSEY  
 M. BLAKE CLEARY

THE BRANDYWINE BUILDING  
 1000 WEST STREET, 17TH FLOOR  
 WILMINGTON, DELAWARE 19801

P.O. BOX 391  
 WILMINGTON, DELAWARE 19899-0391  
 (302) 571-6600  
 (800) 253-2234 (DE ONLY)  
 FAX: (302) 571-1253

110 WEST PINE STREET  
 P.O. BOX 594  
 GEORGETOWN, DELAWARE 19947  
 (302) 856-3571  
 (800) 255-2234 (DE ONLY)  
 FAX: (302) 856-9338

WWW.YOUNGCONAWAY.COM  
 DIRECT DIAL: (302) 571-6707  
 DIRECT FAX: (302) 576-3318  
 pmorgan@ycst.com

ATHANASIOS E. AGELAKPOULOS  
 LISA A. ARMSTRONG  
 GREGORY J. BABCOCK  
 JOSEPH M. BARRY  
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 DONALD J. BOWMAN, JR.  
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 STEPHANIE L. HANSEN  
 DAWN M. JONES  
 RICHARD S. JULIE  
 KAREN E. KELLER  
 JENNIFER M. KINKUS  
 EDWARD J. KOSMOWSKI

SPECIAL COUNSEL  
 JOHN D. MC LAUGHLIN, JR.  
 ELENA C. NORMAN (NY ONLY)  
 KAREN L. PASCALE  
 PATRICIA A. WIDDODD

JOHN C. KUFFEL  
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 D. FON MUTTAMARA-WALKER  
 JENNIFER R. NOEL  
 JOHN J. PASCHETTO  
 ADAM W. POFF  
 SETH I. REEDENBERG  
 FRANCIS J. SCHANNE  
 MICHELE SHERRETTA  
 MONTE T. SQUIRE  
 MICHAEL P. STAFFORD  
 JOHN E. TRACEY  
 MARGARET B. WHITEMAN  
 CHRISTIAN DOUGLAS WRIGHT  
 SHARON M. ZIEG

OF COUNSEL  
 STUART B. YOUNG  
 EDWARD B. MAXWELL, 2ND

December 22, 2005

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G.V.V.

8:30P.M.

BY HAND DELIVERY

Collins J. Seitz, Jr., Esquire  
 Connolly Bove Lodge & Hutz  
 1007 North Orange Street  
 Wilmington, DE 19801

Re: Teleglobe Communications Corporation, et al. v. BCE Inc., et al.

Dear Special Master Seitz:

Please find enclosed (1) an updated privilege log for documents located on the September 2005 privilege log that continue to be withheld for the time period between November 1, 2001 to and including April 23, 2002 (the "Period"), and (2) for in camera review, the first five binders of documents from the log that continue to be withheld for the Period. We are also submitting two binders of documents that were previously listed on the September 2005 privilege log, but that, on further review, are not responsive to the plaintiffs' document requests. We have thoroughly reviewed the September 2005 privilege log in accordance with the standards set forth in your December 1, 2005 decision, and we are producing to the plaintiffs all the documents on the log that should have been produced earlier or should now be produced in accordance with those standards. As described in the email I sent you earlier, we are working extremely hard to fix the technical problems that occurred with respect to the remaining binders and the CD.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Collins J. Seitz, Jr., Esquire

December 22, 2005

Page 2

Should you have any questions or require any additional information, we are available at your convenience.

Respectfully,

  
Pauline K. Morgan

PKM:dw

Enclosure

cc: Gregory V. Varallo, Esquire (with privilege log only)  
Kevin Gross, Esquire (with privilege log only)  
(by Hand Delivery)  
George J. Wade, Esquire (without enclosures)